

Message

From: Wang, Gary [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E0F45B81B7A448C285545E9D3487871E-WANG, LIANG-JANG (GARY)]
Sent: 5/4/2021 4:51:50 AM
To: Yalung, Michelle [Michelle.Yalung@meritenergy.com]
CC: Wiser, Nathan [Wiser.Nathan@epa.gov]
Subject: Merit's MIT records
Attachments: R8 guideline - RTS (2009.09.08).pdf; Merit (2021.05.04) Part I & II MIT Requirements.xlsx

Hi Michelle,

Per our phone call on Monday, please find attached, a spreadsheet of the last MIT tests that is queried from our database, and separated by well fields. Based on the spreadsheet, it appears that amongst the list of Merit's wells, there are 12 wells that are due for a Part I (internal) MITs this year, of which 10 wells are in Circle Ridge Field, and 2 wells are in the Steamboat Butte Field. In reviewing the records, I do have a number of additional items that need to be followed up on. See the bulleted items below:

- **Tribal C-30X-Tensleep (WY20000-02143), Tribal E-5 (WY20917-04631), & Shoshone 66-46 (WY20000-03089):** I have an email from you dated Jan. 8, 2021 notifying EPA that Merit had planned to conduct MITs at these three wells scheduled for Jan. 20, 2021. I don't have any follow up records showing these tests were submitted. Please submit or resend the MIT test results for these three wells to EPA.
- **Radioactive Tracer Surveys:** In reviewing a number of Radioactive Tracer Surveys conducted from last year, we've noticed that the tests were not conducted to EPA guidance (attached). Specifically, the RTS tests need to be conducted at the well's respective maximum allowable injection pressure (MAIP).

Permit ID	Well Name	MAIP	Pressure used during RATs test
WY20890-02136	Tribal CI-2X	1050 psi	360 psi
WY20917-04631	Tribal E-5	1380 psi	975 psi
WY20940-04674	Tribal C-14	1794 psi	690 psi
WY21096-07391	Tribal E-11*	1390 psi	610 psi
WY21098-07393	Tribal C-13*	1765 psi	50 psi
WY22179-08831	Tribal C-32	1045 psi	720 psi

Amongst these wells, Tribal E-11 and Tribal C-13 (asterisked in the table above) will need to have some additional review. We need to clarify on our end whether Part II MIT tests are required for these 2 wells. Merit conducted RTS on these 2 wells in 2020, but my initial review indicate that they weren't listed to require periodic RTS. As for the other wells (Tribal CI-2X, Tribal E-5, Tribal C-14, & Tribal C-32), they will need to be re-tested in accordance to EPA Region 8's RTS guidance. Alternatively, if the test is not tested at the well's MAIP, then the MAIP is subject to a decrease to the pressure that was used during the RATs test.

- **Tribal E-11 (WY21096-07391):** Part II.A.2 and Appendix A of the permit require that the packer shall be set within 100' of the top perforation. The RTS for the well from 2020 show that the packer is currently at 5096', while the top perms are at 5262'. This is a difference of 172', which exceeds the 100' limit. The packer will have to be lowered to a depth within 100' of the well.

Finally, I want to give you a heads up that starting next Monday (May 10th), I will be out of the office, working with another Agency for the next 1-2 months. Please send any questions, and correspondences to my colleague, Nathan Wiser (cc'ed on the email), while I am out. Please let Nathan or I know of any questions you may have on this email. Thanks.

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Underground Injection Control Enforcement

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